

DELAGE LANDEN FINANCIAL  
SERVICES, INC.,

Plaintiff,

TOSHIBA AMERICA MEDICAL  
SYSTEMS, INC.

Plaintiff/Intervener,

v.

DESOTO DIAGNOSTIC IMAGING, LLC., et al.

Defendants and Counter-  
Claimants

CIV. A. NO. 2:02CV2810

### **DEFENDANTS' PROPOSED VOIR DIRE**

Defendants respectfully request, pursuant to Rule 24(a) of the Federal Rules of Civil Procedure, that the Court include the following in its voir dire of prospective jurors:

Have you read or heard of the facts or circumstances of this case? If yes, what have you heard?

What or who was the source of your information?

1. Have you read or heard of the facts or circumstances of this case? If yes, what have you heard? What or who was the source of your information?

2. Do you know any of the parties or the lawyers in this case? The witnesses?

3. Have you formed an opinion about this case? Has anyone discussed the case with you in any way?

4. Do you have any strong feelings for or against large corporations?

5. Do you have any strong feelings for or against doctors?
6. Do you have any strong feelings about women bosses?
7. Would you rather work for a man or a woman?
8. Have you or has anyone in your family ever had a job in the medical equipment sales industry? If so, what type of job?
9. Have you or has anyone in your family ever had a job in the healthcare industry? If so, what type of job?
10. Have you or has anyone in your family ever had a job in the finance industry?
11. Have you ever owned your own business?
12. Do you have any preconceptions about people from Tennessee or Mississippi?
13. Have you, or has anyone in your family, had legal training?
14. Have you or has anyone in your family ever worked for a lawyer or with the legal profession? If yes, what was the nature of this employment?
15. Have you ever had any sort of illness that required the services of a radiologist? Did you have a good or bad experience with the radiologist?
16. What is the highest level of education that you have completed?
17. Have you ever served on a jury before today? What court? Were you a juror in a civil case or criminal case? If civil, what was the nature of the case? Did it result in an award for the plaintiff?

18. Is there anything about your previous experience as a juror or with the judicial system which would make you not want to sit on a jury today?

19. Have you ever been a witness in a trial? If yes, what type of case?

20. Have you ever sued anyone or been sued? If yes, what type of case?

21. Have you ever leased a car or other item that failed to perform properly?  
Was that car or other item ever subject to collection?

22. What organizations do you belong to?

23. What magazines do you subscribe to?

24. What newspapers do you regularly read?

Respectfully submitted,

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Attorneys for Defendants  
DeSoto Diagnostic  
Imaging, LLC, *et al*

Dated: May , 2004

CERTIFICATE OF SERVICE

I certify that, on this date, copies of the foregoing Defendants' Proposed Voir

Dire was served by hand delivery to the following:

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Dated: May , 2004